

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 9

ADVANCEPIERRE FOODS, INC.

and

UNITED FOOD AND COMMERCIAL
WORKERS UNION, LOCAL 75, AFFILIATED
WITH THE UNITED FOOD AND COMMERCIAL
WORKERS, INTERNATIONAL UNION

Cases 09-CA-153966
09-CA-153973
09-CA-153986
09-CA-154624
09-CA-156715
09-CA-156746
09-CA-159692
09-CA-160773
09-CA-160779
09-CA-162392

**COUNSEL FOR THE GENERAL COUNSEL'S MOTION FOR
EXTENSION OF TIME TO FILE RESPONSE TO RESPONDENT'S EXCEPTIONS
AND TO FILE CROSS-EXCEPTIONS**

This Motion respectfully requests an extension of time to file an Answering Brief, Cross-Exceptions, and Brief in Support of Cross-Exceptions in the above-captioned matter.

The Administrative Law Judge issued a Decision and Recommended Order on June 27, 2016. Thereafter, on July 26, 2016, AdvancePierre Foods, Inc. (Respondent) filed Exceptions and a Brief in Support of Exceptions. Pursuant to the Board's Rules and Regulations, the General Counsel's Answering Brief, Cross-Exceptions, and Brief in Support of Cross-Exceptions are due on August 8, 2016.

In addition to regular duties, the lead attorney for the General Counsel was in trial during the week of July 25, 2016; that litigation is ongoing. Co-counsel for the General Counsel is in trial on August 1, 2016. Furthermore, Respondent filed 64 Exceptions, and its Brief in Support of Exceptions totals 50 pages, which demand extended time and attention from attorneys for the

General Counsel. Lastly, lead counsel for the General Counsel is scheduled for long-planned nonrefundable travel between August 5 and August 21, 2016.

Accordingly, Counsel for the General Counsel respectfully moves, pursuant to Section 102.46(f)(2) of the Board's Rules and Regulations, that the Board grant a 3-week extension for the filing of the Answering Brief, Cross-Exceptions, and Brief in Support of Cross-Exceptions in the above-captioned matter. Three weeks is specifically requested given the nature of the pending trial litigation for the attorneys for the General Counsel, as well as the timeline of aforementioned vacation.

Respondent's position was sought via telephone call to Respondent's lead attorney on July 29, 2016 and again August 1, 2016; no response has of yet been provided.

Dated: August 1, 2016

Respectfully submitted,

/s/ Zuzana Murarova

Zuzana Murarova
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/s/ Gideon Martin

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CERTIFICATE OF SERVICE

August 1, 2016

I hereby certify that I served on all parties by sending copies via electronic mail today to the below addresses the attached Counsel for the General Counsel's Motion for Extension of time to File Response to Respondent's Exceptions and to File Cross-Exceptions.

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